

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	Bankruptcy No. 17-11339-TPA
Phillip John McCumber and Heather Lynn	:	Chapter 13
Wilkinson	:	
Debtors	:	
	:	
Rushmore Loan Management Services LLC	:	
Movant	:	
vs.	:	
	:	
Phillip John McCumber and Heather Lynn	:	
Wilkinson	:	
Debtor/Respondent	:	
and	:	
	:	
Ronda J. Winnecour, Esquire	:	
Trustee/Respondent	:	

**STATEMENT IN RESPONSE TO INTERIM NOTICE
OF CURE OF ARREARS**

AND NOW, comes Respondent, Rushmore Loan Management Services LLC, and responds to the Trustee's Interim Notice of Cure of Arrears as follows:

- 1) The Proof of Claim arrears of Claim #21 have been paid in full, satisfying the pre-petition arrearage obligation owed to Respondent.
- 2) The Debtors are current on post-petition payments consistent with § 1322(b)(5) of the Code, as Debtors are due for the 04/01/2020 post-petition payment.

Dated: 04/07/2020

/s / Bradley J. Osborne, Esquire
Bradley J. Osborne, Esquire
Hladik, Onorato & Federman, LLP
Attorney I.D. # 312169
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	:	
Ronda J. Winnecour, Esquire	:	
Trustee/Respondent	:	

CERTIFICATE OF SERVICE

I, Bradley J. Osborne, Esquire., hereby certify that I caused to be served true and correct copies of the **STATEMENT IN RESPONSE TO INTERIM NOTICE OF CURE OF ARREARS** at the respective last known address of each person set forth below on **04/07/2020**:

Michael S. Jan Janin, Esquire
Via ECF:
mjanjanin@quinnfirm.com
Attorney for Debtors

Ronda J. Winnecour, Esquire
Via ECF:
cmecf@chapter13trusteewdpa.com
Trustee

Phillip John McCumber
Heather Lynn Wilkinson
235 East State Street
Albion, PA 16401
Via First Class Mail
Debtors

/s / Bradley J. Osborne, Esquire
Bradley J. Osborne, Esquire
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